

Remarks**I. Claim Status:**

Claims 1-3, 5-12 and 15 are pending and stand rejected. Claim 4 was canceled previously. Claims 13 and 14 have been withdrawn.

II. Rejections under 35 U.S.C. § 112, second paragraph:

Claims 1-3, 5-12 and 15 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicants respectfully traverse the rejection.

At the outset, Applicants wish to thank the examiner for participating in the March 1, 2006 telephonic interview with counsel to discuss the merits of the office action. As the examiner may recall, counsel explained how the sealing ring can, in fact, be positioned between the insulator body and central electrode and simultaneously external to the insulator body. Specific reference to this configuration is found at page 2, paragraph 5 of the specification, again at page 3 at the end of the 1st paragraph and shown in Figure 1 as seal 10 near the bottom of the drawing. As is clear from the drawing, seal 10 sits in a recess formed in the outer surface of the insulator body thereby causing the seal to be positioned *external* to the insulator body and between the central electrode and the insulator body. With this clarification, Applicants respectfully request reconsideration and removal of the § 112, second paragraph, rejections of claims 1-3, 5-12 and 15.

III. Rejections under 35 U.S.C. § 102(b):

Claims 1-3, 5-12 and 15 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Podiak (US 4,193,012). Applicants respectfully traverse the rejections.

Claim 1 recites a sealing ring positioned external to the insulator body and between the insulator body and the central electrode. As explained to the examiner by counsel, Podiak neither shows nor suggests such a configuration. Close scrutiny of Figure 1 from Podiak and the description of the relevant parts of the Podiak spark plug confirm this position.

Referring to Fig. 1 of Podiak, the Podiak spark plug insulator body 13 is sealed from central electrode 14 with silicon-talc sealing material that is tamped and packed at point 22 in bore 17 of insulator 13 between the walls of bore 17 and electrode 14 [2:59-68]. Firing end cement 24 is then injected into the end of the annular space between insulator 13 and electrode 14, which effectively encloses the packing material from the exterior and maintains the sealing material *interior* to the insulator body [3:3-6]. The spark plug configuration of Podiak is thus contrary to and quite distinct from Applicants' novel sealing ring.

In the Response to Arguments section of the office action, the examiner states that "Figure 1 of Podiak clearly shows a sealing ring (2) resting against the insulator body (13) externally, in addition to the sealing ring (15) resting against the insulator body internally." Based on this interpretation, Podiak was deemed to teach a sealing ring external to the insulator body and internal thereto. The interpretation is incorrect as sealing ring 25 of Podiak seals an external surface of insulator body 13 from the spark plug outer shell 12 and *not* from the electrode 14. Seal 15, which is not described or designated as a "sealing ring" is composed of a packed material positioned between electrode 14 and insulator body 13, but clearly internal to insulator body 13 due to the presence of the firing end cement 24. As such, seal 15 cannot be considered a

"sealing ring" nor can it be considered in any way *external* to insulator body 13. To interpret otherwise would involve impermissible hindsight reasoning

For the reasons given, Podiak cannot properly be considered as the basis for the rejection of the claims under § 102(b). Reconsideration and removal of the rejection of claim 1 are respectfully requested.

Claims 2, 3, 5-12 and 15 depend, directly or ultimately, from claim 1 and are allowable for the same reasons given for claim 1. Reconsideration and removal of the rejections of claims 2, 3, 5-12 and 15 are respectfully requested.

IV. Conclusion:

For all the foregoing reasons, the claims are considered definite and are considered to define patentably over the prior art. Consideration is requested and favorable action is solicited.

Respectfully submitted,



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